

Monsanto

DETERGENT/MATERIAL DIVISION

Monsanto Chemical Company
P.O. Box 816
Soda Springs, Idaho 83276
Phone: (208) 547-3391

October 16, 1987

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Superfund Branch

Mr. William J. Glasser
Environmental Protection Specialist
US EPA Region 10
1200 Sixth Avenue
Seattle, Washington 98101

Dear Mr. Glasser:

We received our copy of the Field Operations Workplan and have scheduled the appropriate personnel to be available and assist with the specified sampling, beginning November 2, 1987. I briefly discussed the workplan with Jeff Whidden, and I volunteered the supply of the following Monsanto equipment: pickup truck, portable generator, monitoring well pump starters, purge water drums, and laboratory space for sample preparation and temporary storage.

The scope of the workplan is to collect samples in order to verify sample data supplied to EPA by Monsanto. The workplan also states that the results of the investigation will be used to help determine the need for additional work at the site. Monsanto has both completed and on-going remedial programs that have been designed to eliminate environmental concerns at the facility. Recent sampling data confirms that these remedial programs are succeeding. We would request that the data generated by completing this workplan be added to all of Monsanto's existing data before determining justification for any additional remedial efforts.

Table 1 of the workplan lists several of our process streams as waste streams. The only true waste streams on the site are waste oils that are taken by a local company for recycling, and the plant non-contact cooling water that is discharged under an NPDES permit. The other streams listed for sampling: seal water, phosphy water, ferrophos slag, and calcium silicate slag, should be classified as process streams, recycle streams or as process by-products.

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The hydroclarifier, in particular, is an important part of our manufacturing technology. The proposed sampling of this process stream will jeopardize the confidentiality of our ore preparation methods. The hydroclarifier tank was found to be leaking during the summer of 1984. The tank was immediately replaced along with the installation of a leachate collection system and a secondary non-permeable liner. Monsanto prefers that this process stream be removed from the sampling workplan. We would, however, be happy to demonstrate how this system has been constructed to guard against impact to the groundwater.

I would like to point out some additional concerns we have with specific portions of the workplan.

4.1.1 Well Sampling - The inactive domestic well labeled SWG is not on Monsanto property. If this well is to be sampled, Ecology & Environment, Inc. should obtain permission for access and sampling from the land and well owners.

4.1.2 Waste Samples - Sediments in the clay sealed phosphy water and electrode seal water ponds are likely to contain enough phosphorus that the samples, when exposed to the atmosphere, will be combustible. Sampling precautions should allow for this or these sediments should not be sampled.

4.2.1.1 Ground and Surface Water Samples - Test well 38 has proved to be a low volume producing well. If production in this well is determined so low that a representative sample cannot be obtained, an alternate well should be selected. (Test well 12 is located in that general area).

4.3 Personnel Safety and Equipment Decontamination - "Site Investigation Health and Safety Plan" was not included with the workplan.

5.3 Data Reduction, Validation, and Reporting - Monsanto will require that plant personnel be present during sampling and that a sample split of each sample collected be provided to Monsanto by Ecology & Environment, Inc. A copy of all field notes and field reports should also be given to the Monsanto representative. Access to a copy machine will be made available.

6.0 Reports - Monsanto should be provided in a timely manner a copy of all reports and analysis data. A preliminary copy of EPA form 2070-13 is also requested.

R. L. Geddes

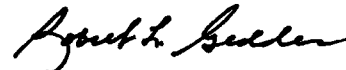
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As an entrance requirement to the Monsanto Soda Springs facility, procedure requires that all contractors and visitors view a short plant orientation and safety presentation. This procedure will be required of all Ecology & Environment, Inc. personnel upon entering the plant site. Each visitor will also be required to sign the visitors permit forms (secrecy agreement and liability waiver). Copies of these are attached for your review.

A vehicle pass will be issued by the plant security as well as the necessary personal protection safety equipment. Plant procedure also requires that proof of insurance be presented to the purchasing director prior to accessing the property. Details of the required insurance are attached and should be filled out and authorized prior to your arrival.

Monsanto will provide any assistance possible to the sampling program to ensure representative, accurate and timely results from this inspection. If you have any additional comments or if we can be of help, please call.

Sincerely,



R. L. Geddes
Environmental Engineer

RLG/jw
Attachment

cc: Jeff Whidden
Ecology & Environment, Inc.
100 S. Washington Street, Suite 302
Seattle, Washington 98104

VISITORS PERMIT
REGULATORY AGENCY PERSONNEL
MONSANTO COMPANY

In response to your representation that your visit is required by official duties as an employee of the _____, Monsanto Company is pleased to grant your request for permission to inspect certain of its facilities at the above named plant. Information of a confidential, trade secret and/or proprietary character is incorporated into said plant. Therefore, Monsanto requests that all information relating to equipment, processes, raw materials suppliers or customers (except emission and effluent data which you gather from your own observations at the plant) be treated as confidential. Monsanto also requests that all information provided to you relating to equipment, processes, raw materials, suppliers or customers (except emission and effluent data) which is identified as confidential will be treated as confidential. You agree that such information will not be used or disclosed outside of EPA, without a determination as to its confidentiality and written notice and opportunity to comment thereon being provided to Monsanto.

You recognize that said plant is a chemical manufacturing plant that carries with it certain hazards and inherent dangers. While on the plant site, you agree to follow the directions of your guide and abide by all applicable plant rules and regulations.

Please indicate your acceptance of the above by signing on the line provided below.

ACCEPTED:

By _____

Title _____

Affiliation _____

Date _____

THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES LISTED BELOW.

NAME AND ADDRESS OF AGENCY	COMPANIES AFFORDING COVERAGES	
	COMPANY LETTER	A
	COMPANY LETTER	B
	COMPANY LETTER	C
	COMPANY LETTER	D
NAME AND ADDRESS OF INSURED	COMPANY LETTER	E
	COMPANY LETTER	
	COMPANY LETTER	

This is to certify that policies of insurance listed below have been issued to the insured named above and are in force at this time

COMPANY LETTER	TYPE OF INSURANCE	POLICY NUMBER	POLICY EXPIRATION DATE	Limits of Liability in Thousands (000)		
					EACH OCCURRENCE	AGGREGATE
	GENERAL LIABILITY			BODILY INJURY	\$	\$
	<input checked="" type="checkbox"/> COMPREHENSIVE FORM			PROPERTY DAMAGE	\$	\$
	<input checked="" type="checkbox"/> PREMISES—OPERATIONS					
	<input type="checkbox"/> EXPLOSION AND COLLAPSE HAZARD					
	<input type="checkbox"/> UNDERGROUND HAZARD					
	<input checked="" type="checkbox"/> PRODUCTS—COMPLETED OPERATIONS HAZARD			BODILY INJURY AND PROPERTY DAMAGE COMBINED	\$	\$
	<input checked="" type="checkbox"/> CONTRACTUAL INSURANCE			PERSONAL INJURY		\$
	AUTOMOBILE LIABILITY			BODILY INJURY (EACH PERSON)	\$	
	<input checked="" type="checkbox"/> COMPREHENSIVE FORM			BODILY INJURY (EACH ACCIDENT)	\$	
	<input checked="" type="checkbox"/> OWNED			PROPERTY DAMAGE		
	<input checked="" type="checkbox"/> HIRED			BODILY INJURY AND PROPERTY DAMAGE COMBINED	\$	
	<input checked="" type="checkbox"/> NON-OWNED					
	EXCESS LIABILITY			BODILY INJURY AND PROPERTY DAMAGE COMBINED	\$	\$
	<input type="checkbox"/> UMBRELLA FORM					
	WORKERS' COMPENSATION and EMPLOYERS' LIABILITY			STATUTORY	\$	(EACH ACCIDENT)
	OTHER					

DESCRIPTION OF OPERATIONS, LOCATIONS, VEHICLES

Work for Monsanto Company

Cancellation: Prior to cancellation of any of the above described policies, the issuing company will mail _____ days written notice to Monsanto Company at the address indicated below

SEND TO:
MONSANTO COMPANY

Attention:

DATE ISSUED _____

AUTHORIZED REPRESENTATIVE

VENDOR NAME _____

CONTRACT NO. _____

INSURANCE ANALYSIS

Vendor Act. Coverage	Insurance Required Per Contract	Short/ Over
<input type="checkbox"/> Comprehensive Form <input type="checkbox"/> Premises-Operations <input type="checkbox"/> Explosion and Collapse Hazard <input type="checkbox"/> Underground Hazard <input type="checkbox"/> Products/Completed Operations Hazard <input type="checkbox"/> Contractual Insurance <input type="checkbox"/> Broad Form Property Damage <input type="checkbox"/> Independent Contractors <input type="checkbox"/> Personal Injury	Bodily Injury-\$1,000,000 ea occur Property Damage-\$500,000 ea occur	
<input type="checkbox"/> Comprehensive Form <input type="checkbox"/> Owned <input type="checkbox"/> Hired <input type="checkbox"/> Non-owned	Bodily Injury-\$500,000 ea occur Property Damage-\$100,000 ea occur	
<input type="checkbox"/> Umbrella Form <input type="checkbox"/> Other Than Umbrella Form	Not Required	
WORKERS' COMPENSATION AND EMPLOYERS' LIABILITY	Statutory \$500,000 ea occurrence	

CANCELLATION : Should any of the above described policies be cancelled before the expiration date thereof, the issuing company will mail 20 days prior written notice to the certificate holder named to the left.